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December 12, 2024

**VIA CM/ECF Filing**

Honorable Arun Subramanian, United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: Jane Doe et al v. Government of the U.S. Virgin Islands et al., 23-cv-10301

Dear Hon. Subramanian:

My firm represents plaintiffs in this matter and I write in response to Cecile de Jongh's letter objecting to the scheduling of depositions. Plaintiffs are not seeking to take depositions before the motions to dismiss have been decided -- we are just trying to schedule them for February to avoid any difficulties in setting depositions with numerous parties and counsel in this case. If the motions to dismiss are not adjudicated by the February deposition dates, plaintiffs would agree to adjourn them (as we agreed to adjourn the January dates), but otherwise, all we are trying to do is make sure that we complied with this Court's discovery deadline of June 2, 2025 and expert disclosure deadline of February 28, 2025.

Thank you for Your Honor's attention to this matter.

Respectfully,

  
Jordan Merson